WORKSHOP SUMMARY

Development of DOE Technical Standard, SAFT-0060,
"INTEGRATION OF SAFETY AND HEALTH INTO FACILITY DISPOSITION ACTIVITIES"

Rocky Flats Environmental Technology Site
March 19-21, 1997

WORKSHOP OBJECTIVE

The EH Office of Facility Safety Analysis (EH-32) and the Office of Field Support (EH-53) conducted a DOE-wide workshop at the Rocky Flats Environmental Technology Site on March 19-21, 1997 to discuss the development of a DOE Technical Standard (SAFT-0060) for addressing safety and health during facility disposition activities. The workshop objective was to solicit input from DOE and contractor personnel on the following:

- the need for a DOE technical standard for facility disposition activities;
- comments and suggestions on a preliminary draft version "-1A" of SAFT-0060; and
- any additional S&H issues not currently addressed in the preliminary draft.

The workshop also provided a forum for exchanging S&H experiences and strategies among DOE site and headquarters personnel. The workshop identified working group members interested in participating in follow-on technical standard development activities (*see Attachment 1 for the Workshop Agenda.)*

ATTENDEES

Over 70 participants attended the workshop representing DOE line programs, field offices and contractor organizations. They included both field project managers and S&H personnel involving in facility disposition activities. DOE senior managers attending the workshop included Richard Black (Director, Office of Nuclear Safety Policy and Standards, EH-31), Robert Barber (Director, Office of Field Support, EH-53) and Xavier Ascanio (Director, Engineering and Operations Support Group, DP-45). Members of the DNFSB staff also attended the workshop and provided their perspectives on the standard development. (S*ee Attachment 2 for a list of attendees.)*

RESULTS

The workshop participants, in general, agreed that there is a need for a technical standard such as SAFT-0060; they also supported the scope and targeted audience (project team including project managers and S&H personnel) reflected in the preliminary draft.

Five concurrent breakout sessions were held to discuss specific issues; results of these discussions including the specific action items are summarized in *Attachment 3*. In addition, the following actions were recommended for overall enhancement of the draft SAFT-0060:

- more focus on worker safety throughout the document;
- more explicit guidance and illustrative examples on tailoring S&H performance expectations and directives implementation for non-nuclear facility disposition activities;
- more detailed S&H issue resolution guidance for audiences with minimal experience;

- more explicit clarification of “intent” of individual DOE S&H orders applicable to facility disposition;
- more emphasis on hazards management, not “paper management;”
- better linkage with the “EM facility disposition process,” developed in support of DOE 430.1, Life Cycle Asset Management; and
- more focus on “grading” and “tailoring” S&H guidance for the various phases of facility disposition based on the work and hazards.

PATH FORWARD

Workshop participants will continue working together on improvements to SAFT-0060 as necessary to address specific workshop issues and recommendations. The next steps include the following:

- Coordination meetings with EM to link S&H with “EM facility disposition process” -- (March 97, and continue through completion of final draft in September 97);
- Site visits to discuss specific S&H issues -- (April to May 97);
- Completion of actions listed in Attachment 3 (Breakout Session Summaries) with support from participants of workshop breakout sessions (April to May 97);
- Revision 0 of the technical standard for formal review and comment resolution -- (early June 97);
- Small-scale pilot demonstrations of SAFT-0060 concepts at Oak Ridge and Hanford — (begin in April 97); and
- Final draft technical standard for approval (September 97).

ATTACHMENT

Attachment 1: Workshop Agenda
Attachment 2: Listing of Workshop Attendees
Attachment 3: Breakout Session Summaries

Attachment 1

Workshop for DOE Technical Standard Development on Integration of Safety and Health into Facility Disposition March 19-21, 1997, Building 060 and 111 Rocky Flats Environmental Technology Site

AGENDA

DATE/TIME	SESSION	*TECHNICAL LEAD & SUPPORT	MODERATOR
March 19 (Bldg. 060)			
100-130pm	Introduction	T. Eng, PK Niyogi	
130-245pm	Users/Stakeholders Perspectives		T. Eng
	-- EM	S. Warren (EM-40)	
	-- DNFSB	S. Stokes (DNFSB staff)	
	-- EFCOG	J. Zimmer (RFETS)	
	-- DP	X. Ascanio (DP-45)	
	-- EH	R. Barber (EH-53)	
245-300pm	Break		
300-430pm	Technical Standard Overview		PK Niyogi
	-- Overall Layout	T. Eng	
	-- Section 3, Integrated Safety & Health Management Framework (ISHMF)	J. Woody	
	-- Section 4.1, Hazard Categorization (HC)	J. Woody	
	-- Section 4.2, Integrated Hazards Analysis (IHA)	M. Crowley	
	-- Section 4.3, TSRs/Safety Controls	J. Hansen	
	-- Section 4.4, S&H Documentation	J. Abeles	
	-- Section 4.5, Worker Safety	C. Floreen	
	-- Section 4.6, CERCLA/DOE Safety Basis Integration	D. Harrison	
430-500pm	Breakout Strategy	T. Eng, PK Niyogi	

DATE/TIME	SESSION	*TECHNICAL LEAD & SUPPORT	MODERATOR
March 20 (Bldg 060)	Morning Breakout Sessions:		
800-1030am	-- ISHMF	J. Woody	T. Eng
800-1030am	-- HC, IHA, S&H Documentation	H. Goldin (HC) M. Crowley (IHA) J. Abeles (S&H Doc.) R. Vrooman	D. Pyatt
800-1030am	-- TSRs/Safety Controls	J. Hansen, J. McCormick	V. Kapila
800-1030am	-- Worker Safety	E. Dodd, C. Floreen, R. Richard, E. Walker	J. Connelly
800-1030am	-- CERCLA/DOE Safety Basis Integration	D. Harrison, J. Bascietto, N. Kerr	G. Detsis
1030-1045am	Break		
1045-100pm	Plenary Session & Working Lunch (Morning Breakout Session Reports)		T. Ekman
	Afternoon Breakout Sessions		
100-300pm	-- Technical Standard Scope and Additional Issues	M. Crowley, J. Woody, T. Eng, T. Ekman	PK Niyogi
100-300pm	-- HC, IHA, S&H Documentation (Continued from Morning Session)	J. Abeles, H. Goldin, R. Vrooman	D. Pyatt
100-300pm	-- TSRs/Safety Controls (Continued from Morning Session)	J. Hansen, J. McCormick	V. Kapila
100-300pm	-- Worker Safety (Continued from Morning Session)	E. Dodd, C. Foreen, R. Richard, E. Walker	J. Connally
100-300pm	-- CERCLA/DOE Safety Basis Integration	D. Harrison, J. Bascietto, N. Kerr	G. Detsis
300-315pm	Break		
315-530 pm	Plenary Session 2 (Afternoon Breakout Session Reports)		D. Pyatt
March 21 (Bldg 111) 800-1000am	Participants' Comments and Action Items	T. Eng, PK Niyogi	
1000-1015am	Break		
1015-1130am	Standard Development Assignments	T. Eng, PK Niyogi	
1130-1200pm	Next Steps	T. Eng, PK Niyogi	

Attachment 2: Attendees

TECHNICAL STANDARD WORKSHOP MARCH 19-21, 1997 DENVER, CO		
NAME	**COMPANY**	**PHONE NUMBER**
Saleem Salaymeh	WSRC/Savannah River	(803) 952-6816
Russell Rickard	Lockheed Martin - Oak Ridge	(423) 574-4621
William Neyer	DOE/OH	(513) 648-3178
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Dick Englehart	DOE/EH-31	(301) 903-3918
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William K. Crowley	Lockheed Martin Energy Services	(423) 574-6495
David C. Landguth	Lockheed Martin Energy Research	(423) 576-7363
John M. Connelly	DOE/EH-52	(301) 903-5722
Tricia B. Ekman	DOE/EH-53	(301) 903-7771
George Detsis	DOE/EH-53	(301) 903-1488
Andrew Szilagyi	DOE/EM-62	(301) 903-4278
Tim Campbell	Wastren, Inc.	(970) 248-7663
Ralph A. Butler	Argonne National Lab	(301) 948-0698
Jann Buller	Booz-Allen	(301) 916-7354
Paul Wu	DOE/EH-22	(301) 903-5632
Jeff Woody	Link Technologies, Inc.	(301) 515-9654
Howard Goldin	Link Technologies, Inc.	(301) 515-9654

TECHNICAL STANDARD WORKSHOP MARCH 19-21, 1997 DENVER, CO		
NAME	**COMPANY**	**PHONE NUMBER**
Donnie Harrison	**Link Technologies, Inc.**	**(301) 515-9654**
Edwin Dodd, III	**Link Technologies, Inc.**	**(509) 735-6971**
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John Abeles	**Parallax**	**(301) 428-1493**
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TECHNICAL STANDARD WORKSHOP MARCH 19-21, 1997 DENVER, CO		
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Dave Humphrey	**DOE/EH**	
Dave Matia	**PPC**	
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Barbara Swenson	**K-H**	**(303) 966-5794**

Attachment 3: Breakout Session Summaries

Session 1: SAFETY MANAGEMENT PERFORMANCE EXPECTATIONS FOR FACILITY DISPOSITION ACTIVITIES

Objective: *Discuss integrated safety and health management and associated S&H performance expectations and improvements necessary for Section 3 of the standard*

Discussion Topics:

- Selection of project management as intended audience and appropriate level of detail necessary for selected audience;
- Technical accuracy of ISHMF process and applicability to facility disposition activities; and
- Completeness and technical accuracy of S&H performance expectations.

Path Forward:

- Provide more emphasis on grading S&H performance expectations for non-nuclear and routine facility disposition activities.
- Develop illustrative examples of ISHMF process using facility disposition situations ranging from hazardous nuclear facilities to simple, non-nuclear facilities.
- Better define ISHMF process and discuss how it links with facility disposition process defined in the EM Draft Facility Disposition Manual (M430.1-1).
- Define more explicitly S&H performance expectations for work execution and feedback processes.
- Incorporate additional S&H performance expectations for worker safety.

Session 2: HAZARD CATEGORIZATION, INTEGRATED HAZARD ANALYSIS, AND HAZARD BASELINE DOCUMENTATION

Objective: *To improve the Standard's discussion of hazard categorization, integrated hazards analysis, and hazard baseline documentation.*

Discussion Topics:

- Development and use of the integrated hazards analysis process for facility disposition activities;
- Documentation of hazard baseline analysis, readiness review requirements, and turnover packages; and
- Application of the hazard categorization process to facility disposition activities.

Path Forward:

- Provide examples of integrated hazard analysis in Standard. Examples should address "graded" approach and "tailoring."
- Include brief discussion of the safety/hazards analysis process in the Standard. (This discussion can be placed in either section 1 or as part of the introduction to sec 4.) This discussion, as well as the remainder of section 4 needs to be recast from the Project Managers' perspective, rather than that of a safety analyst.

- Strive to emphasize hazards analysis and to minimize documentation efforts (e.g., only do as

necessary to demonstrate safety of facility).

- Work with EH-31 to develop clarification for the following issues:
  - hazard categorization methodology for facilities with fixed contamination and activated metals - the approach will follow that of the proposed 10 CFR 830.110,
  - for facilities that are recategorized as nonnuclear during final hazard categorization, submittal of final hazard categorization documentation in forms other than an SAR,
  - use of staged SARs for facilities with nuclear activities, and
  - retirement of SARs for facilities that no longer contain nuclear inventories that exceed category 3 threshold values.

Session 3: TECHNICAL SAFETY REQUIREMENTS AND OTHER SAFETY CONTROLS FOR FACILITY DISPOSITION ACTIVITIES

Objective: *To determine the appropriateness and usefulness of material in Section 4.3 of the draft Standard, and to identify changes or new issues relative to safety controls in facility disposition.*

Discussion Topics:

- Application of Integrated Safety Management principles for derivation and implementation of safety controls;
- Usefulness of material presented in Section 4.3 of the draft Standard;
- Intended audience for use of draft Standard Section 4.3;
- Application of a worker safety management structure for all hazard category facilities or activities; and
- Use of a USQ 'like' process for worker safety, and for facilities which are not nuclear.

Path Forward:

- Abbreviate text to provide major technical and process information only.
- Provide examples, with site specific field support, for each subsection.
- Refine the USQ 'like' process for both facility and worker safety application.
- Provide guidance for integrating a worker safety USQ 'like' process into nuclear facility safety management.

Session 4: INTEGRATING WORKER SAFETY INTO THE AUTHORIZATION BASIS

Objective: *To determine the appropriateness and usefulness of material in Section 4.4 of the draft Standard, and to identify changes or new issues relative to worker safety during facility disposition.*

Discussion Topics:

- Worker involvement during the hazards analysis development;
- Selection of the appropriate methodology for performing worker safety hazards analyses; and
- Change control for worker safety issues.

Path Forward:

- Develop a methodology for reacting to unanalyzed and newly discovered hazards.
- Investigate attributes of other worker safety programs for inclusion in the Standard.
- Develop an approach for tailoring worker safety management to work scope and hazards.

Session 5 : INTEGRATING SAFETY AND HEALTH CONSIDERATIONS INTO DECOMMISSIONING

Objective: *Clarify discussions relating to the integration of safety and health in the facility decommissioning process as articulated in and modeled after DOE M 430.1-1X and DOE O430.1, Life Cycle Asset Management*

Discussion Topics:

- Facility disposition process contained within M 430.1-1X;
- Best "intended audience" for the standard;
- Present the process for decommissioning a facility and identify associated worker safety requirements as contained in Section 4.6 of draft Standard, and
- Worker safety issues for nonnuclear facilities under 40 CFR 300.150.

Path Forward:

- Include in the Standard better distinction between requirements for nuclear and nonnuclear facilities. (The M 430.1 process is the same but the rigor and formality it changes.)
- Revise text to reflect contents of DOE M 430.1-1X.
- Delete discussions in text pertaining to DOE Orders, ARARs, and applicability of CERCLA to deactivation.
- Emphasize that for nonnuclear facilities the decommissioning process should comply with 40 CFR 300.150. (This approach will receive further consideration in the future.)
- Delete Appendix C (Remedial Design Report Format and Content).